UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

FEB 1 2 2019

Mr. Bill Fuhr
Davenport Public Library
321 North Main Street
Davenport, Iowa 52801-1490

Dear Mr. Fuhr:

Enclosed is a fact sheet and revised copy of the Statement of Basis for the U.S. Environmental Protection Agency's proposed final decision for corrective action at the R.V. Hopkins site located in Davenport, Iowa. Please replace the Statement of Basis document in the folder sent to you last week with these documents. Thank you for your assistance in this matter.

Sincerely,

Bruce A. Morrison
Project Manager
RCRA Corrective Action and Permits Section
Waste Remediation and Permitting Branch
Air and Waste Management Division

Enclosure

RCRA

582557

FACT SHEET

Public Comment Period for Proposed Final Remedy
RV Hopkins Inc.
(Former Quad City Drum Recycling)
Davenport, Iowa County, Iowa
February 2019

REGION 7: Iowa, Kansas, Missouri, Nebraska and Nine Tribal Nations

INTRODUCTION

The U.S. Environmental Protection Agency (EPA) Region 7 invites the public to comment on the Proposed Final Remedy (Proposed Final Corrective Measures) for the RV Hopkins Inc. site (former Quad City Drum Recycling), 743 Schmidt Road, Davenport, Iowa.

PROPOSED FINAL REMEDY

The Proposed Final Remedy entails land-use controls for the site due to the level of lead remaining in soil that may pose a health risk. The land-use controls will prohibit residential development at the facility. Use controls will also require that soils disturbed at the facility be characterized for potential contaminants prior to handling and removing from the property.

EPA encourages the public to review this Proposed Final Remedy and the Administrative Record, which contains documents supporting the Proposed Final Remedy.

The public comment period will run from **February 11, 2019, through March 12, 2019**.

Written comments on the Proposed Final Remedy must be mailed or emailed no later than **March 12, 2019,** and must be sent to:

Bruce A. Morrison
EPA Region 7 (AWMD/WRAP)
11201 Renner Boulevard
Lenexa, KS 66219
Or by email: morrison.bruce@epa.gov

CONTAMINANTS

Environmental investigations have identified widespread lead in soil as the primary contaminant of concern, with minor amounts of polychlorinated biphenyls and dieldrin present.

BACKGROUND

RV Hopkins Inc. and Quad City Drum Recycling operated as a drum reconditioning/recycling facility from 1964 to sometime in 2012. Drum reconditioning consisted primarily of washing, shot blasting, and repainting 55-gallon metal drums. Extensive cleanup actions have been performed at the facility that included the removal of drummed wastes and the capping of lead-contaminated soil.

FOR MORE INFORMATION

The Administrative Record is available for public review during normal business hours at the following locations:

Davenport Public Library
321 North Main Street
Davenport, IA 52801-1490
Phone: 563-326-7832

EPA Region 7 Records Center
11201 Renner Boulevard
Lenexa, KS 66219
Phone: 1-800-223-0425

After consideration of all comments received, EPA will make a final remedy decision. If the decision is made to select a final remedy that is substantially unchanged from the Proposed Final Remedy, EPA will notify all persons submitting comments or requesting a

notice of the final decision. If the Proposed Final Remedy is substantially changed, EPA will issue another public notice indicating the changes.

If you have questions or want to receive further information, please contact:

Tamara Freeman
Community Engagement Specialist
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219
Toll-free: 1-800-223-0425
Email: freeman.tamara@epa.gov

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STATEMENT OF BASIS

RV Hopkins Facility

EPA ID # IAD022096028
Davenport, Iowa

Facility/Unit Type:	Inactive drum recycling facility
Contaminants:	Lead, volatile organic compounds, semi-volatile organic compounds
Affected Media:	Soil, groundwater
Proposed Remedy:	Property activity and use limitations/land use controls

INTRODUCTION

This Statement of Basis describes the proposed corrective measures (the proposed final remedy) for the former RV Hopkins, Inc. site, also known as the former Quad City Drum Recycling site. The RV Hopkins site is located at 743 Schmidt Road, Davenport, Iowa. (Figure 1). The supporting basis for the proposed final remedy is also presented.

The U.S. Environmental Protection Agency Region 7 is issuing this Statement of Basis as part of its public participation responsibilities under the Resource Conservation and Recovery Act.

This document highlights the information that is presented in more detail in the site Administrative Record. The information includes the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) and other site investigation documents. The EPA encourages the public to review these documents for a more complete understanding of the environmental issues at this facility and the final corrective action activities that are proposed. The Administrative Record locations are noted at the end of this document.

PROPOSED FINAL REMEDY

The proposed final remedy for the RV Hopkins site consists of the implementation of institutional controls that will limit future use and activity at the site. Activity and use limitations will provide protectiveness through restricting site uses which may result in exposures. These limitations will prohibit residential development and require the characterization and appropriate management of any materials that are excavated whenever areas of contaminated soil on the site are disturbed.

FACILITY BACKGROUND

RV Hopkins and Quad City Drum Recycling operated as a drum reconditioning/recycling facility from 1964 to sometime in 2012. Drum reconditioning consisted primarily of washing, shot blasting, and repainting metal 55-gallon drums. A RCRA Facility Assessment completed in 1993 identified a total of 12 Solid Waste Management Units (SWMUs) that consisted of waste storage areas, bag houses, a furnace, and storm water drainage and storage areas.

Multiple environmental investigations have been performed since 1982 to determine the extent of releases to the environment at the site, including soil and groundwater. The following table identifies the historical maximum concentration of hazardous constituents of concern in the soil and compares them to EPA's Regional Screening Levels for industrial soils.

Media	Contaminant of Concern	Maximum Concentration (mg/kg)	Regional Screening Level[1] (mg/kg)	Remediation Goal (mg/kg)
Soil	Aroclor 1254	29	0.97	0.97
Soil	Aroclor 1260	3.65	0.99	0.99
Soil	Arsenic	19	3	3
Soil	Dieldrin	0.17	0.14	1.4
Soil	Lead	60,000	800	800

[1] The screening levels are the USEPA regional screening levels of November 2017 based on industrial exposure to soils, assuming an excess lifetime cancer risk of $1x10^{-6}$ and a hazard index of 1.

The following table identifies the historical maximum concentration of hazardous constituents in groundwater and compares them to drinking water standards, also referred to as Maximum Contaminant Levels (MCL).

Media	Contaminant of Concern (µg/L)	Maximum Concentration (µg/L)	MCL (µg/L)	Remediation Goal (µg/L)
Groundwater	Arsenic	86	10	10
Groundwater	Barium	2,400	2,000	2,000
Groundwater	Cadmium	21.7	5	5
Groundwater	Chlordane	15	2	2
Groundwater	Chromium	340	100	100
Groundwater	Lead	23,000	15	15
Groundwater	Trichloroethene	9	5	5
Groundwater	Vinyl chloride	10	2	2

All tanks, drums, and waste piles were removed from the facility by Quad City Drum Recycling in accordance with an approved site closure plan. Interim corrective measures were completed in 2018 that included the placement of a soil cap on areas where lead exceeded the EPA regional screening level for industrial soil.

SUMMARY OF FACILITY RISKS

A Human Health Risk Assessment (HHRA) was not prepared for this facility. Also, an Ecological Risk

Assessment was not prepared for this facility because it is located in an industrial area that does not provide suitable habitat for potential ecological receptors. Interim corrective measures previously performed have removed all drummed wastes, tanks, and waste piles. Lead-contaminated soils have been capped with clean soil. The anticipated Environmental Covenant for the facility will restrict the site property from future residential development and will require that the soil cap be maintained in a manner that will prevent human exposure.

EVALUATION OF THE PROPOSED FINAL REMEDY

For any corrective measure alternative evaluated for implementation as a final remedy, detailed documentation must be provided on how the potential remedy will satisfy the EPA's four "General Standards for Corrective Measures." These four corrective measures standards are identified as "*Overall Protection of Human Health and the Environment*," "*Attainment of Media Cleanup Standards*," "*Control the Sources of Releases*," and "*Compliance with Standards for the Management of Wastes*." The proposed final remedy for the RV Hopkins facility meets the standard for overall protection of human health and the environment because EPA has determined that the previously performed interim measures that removed all hazardous wastes in conjunction with soil capping and property activity and use restrictions will be protective of human health and the environment. The inspection and maintenance of the soil cap in conjunction with land use restrictions prohibiting future residential development at the facility will adequately control the source of potential release and attain media cleanup standards, which for this site would be the continued containment of contaminated soil with controls that prevent exposure and off-site migration of waste constituents. In addition, soil capping and property activity and use restrictions are consistent with, and in compliance with current standards for the management of wastes.

Corrective measure alternatives must also be evaluated using the five selection decision factors of *Short-Term Effectiveness; Long-Term Reliability and Effectiveness; Reduction of Toxicity, Mobility, or Volume of Wastes; Implementability;* and *Cost*. The proposed final remedy will be effective in the short-term, as the property activity and use restrictions can be implemented in a relatively short time period. The proposed remedy will be effective in the long term due to the provisions for routine maintenance of the capped soils and the implementation of land use restrictions for as long as the waste remains in place. Property activity and use restrictions are readily implementable and relatively affordable components of a corrective measures final remedy. In conclusion, the proposed remedy provides a reasonable approach to meeting the remediation goals identified above.

PUBLIC PARTICIPATION

The EPA solicits input from the public on the proposed remedy for the RV Hopkins site. The EPA will make a final remedy decision for the facility only after the public comment period has ended and all comments have been reviewed and responded to in writing. The EPA may modify the proposed final remedy or select another remedy based upon new information or comments received from the public during the public comment period.

The EPA has set a 30-day public comment period from February 11, 2019 through March 12, 2019 to encourage public participation in the final remedy selection process. A notice will be published in the Quad-City Times that the Statement of Basis and supporting documents are available for review. If requested, a public availability session will be held to allow the public an opportunity to discuss the proposed final remedy with the EPA representatives. A public hearing will be scheduled, if requested by

the public and accompanied by a statement of issues to be raised in the hearing, at which the EPA will receive both oral and written comments. The Administrative Record, where the public may review the Statement of Basis and other relevant documents, is available at the following locations:

U.S. Environmental Protection Agency
Region 7
Records Center
11201 Renner Boulevard
Lenexa, Kansas 66219

Davenport Public Library
321 North Main Street
Davenport, Iowa 52801-1490
(563) 326-7832

CONTACT:
U.S. Environmental Protection Agency, Region 7
Attn: Bruce Morrison
Lenexa, Kansas 66219
Phone: (913)551-7755
Email: morrison.bruce@epa.gov

R.V. Hop ns – Former Quad ity Drum
EPA ID# IAD022096028 Facility Boundary

Legend

RV Hopkins Facility

0 0.015 0.03 0.06 0.09 0.12 Miles

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